

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DEREK CARRIER and DORA CARRIER, individually, and on behalf of all others similarly situated;

Plaintiffs,

vs.

RAVI ZACHARIAS
INTERNATIONAL MINISTRIES,
INC., a 501(c)(3) Corporation; RZIM PRODUCTIONS, INC., a Georgia Non-Profit Corporation;
MARGARET ZACHARIAS, in her Capacity as ADMINISTRATOR OF THE ESTATE OF RAVI KUMAR ZACHARIAS,

Defendants.

Case No.: 1:21-cv-03161-TWT

PLAINTIFFS' NOTICE OF 30(B)(6) DEPOSITION OF DEFENDANT RAVI ZACHARIAS INTERNATIONAL MINISTRIES, INC.

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, counsel for Plaintiffs Derek Carrier and Dora Carrier (“Plaintiffs”) will take the deposition, on oral examination, of the person(s) most qualified to testify on behalf of Defendant Ravi Zacharias International Ministries, Inc., commencing at 9:00 a.m. on [TBD based on future Court Order] (or at such

other date and time as the parties mutually agree), via Zoom videoconference, or at such other location as the parties mutually agree. This deposition will be taken pursuant to Fed. R. Civ. P. 30 *et seq.* and before a certified court reporter. If this deposition is not completed in one day, the deposition will continue from day to day thereafter, at the same time and place, Sundays and holidays excepted, until completed.

PLEASE TAKE FURTHER NOTICE that the deposing party intends to cause the proceedings to be recorded stenographically before a certified court reporter. Please take further notice that Plaintiffs intend to record the deposition testimony by the stenographic method through the instant visual display of the testimony. Please take further notice that the Plaintiffs may record the deposition by audio or video technology, and the deposing party specifically reserves the right to use the videotaped deposition at the time of trial.

PLEASE TAKE FURTHER NOTICE that the deponent is required to bring with them and to release originals or complete and legible copies of any and all documents described in Attachment A.

PLEASE TAKE FURTHER NOTICE that the deponent is a corporation or other business entity.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Ravi Zacharias International Ministries, Inc. is required to designate and produce at the deposition one or more of its officers, directors, managing agents, members, partners, employees, or agents to testify on its behalf as to the following matters to the extent of any information known or reasonably available to Defendant Ravi Zacharias International Ministries, Inc.:

DEFINITIONS

Notwithstanding any definition set forth below, each word, term, or phrase used in these Requests is intended to have the broadest meaning permitted pursuant to Rule 26 of the Federal and Local Rules of Civil Procedure. As used in these Requests, the following terms are to be interpreted in accordance with the definitions set forth below.

A. “COMMUNICATION(S)” refers to any act, action, oral speech, written correspondence, contact, expression of words, thoughts, ideas, transmission or exchange of data or other information to another person, whether orally, person-to-person, in a group, by telephone, letter, personal delivery, telex, email, facsimile, text message, instant message, recorded message or any other process—electronic, computer, or otherwise. All such communications in writing shall

include, without limitation, printed, typewritten, handwritten, electronic, or other DOCUMENT(S).

B. “REFER TO” “RELATE TO” or “CONCERN” shall include within their meaning “containing,” “alluding to,” “responding to,” “commenting upon,” “discussing,” “explaining,” “mentioning,” “analyzing,” “constituting,” “memorializing,” “compromising,” “reporting,” “incorporating,” “confirming,” “listing,” “evidencing,” “setting forth,” “summarizing,” or “characterizing,” either directly or indirectly, in whole or in part.

C. “RZIM” refers to Defendant Ravi Zacharias International Ministries, Inc., which includes their agents, servants, employees, employers, representatives, co-venturers, associates, independent contractors, predecessors in interest and/or other business names such as RZIM and/or any entities in which RZIM is a member, manager, or stockholder, or any affiliated entity.

D. “YOU” and “YOUR” refers to RZIM and includes all PERSONS acting or purporting to act at the direction of or on behalf of RZIM.

E. “ACCOUNTING” means the process and means of recording financial transactions pertaining to YOUR business.

F. “DONATION” means anything of monetary value given to YOU by a PERSON who is not YOUR employee, agent, or officer.

G. "DONOR" means a PERSON who is not YOUR employee, agent, or officer who has given YOU a DONATION.

H. "PERSON" means any natural person or any business, charitable, religious, legal, or governmental entity or association.

I. "PLAINTIFFS" means and refers to Plaintiffs Derek Carrier and Dora Carrier.

MATTERS ON WHICH EXAMINATION REQUESTED

The matters upon which examination is requested are as follows:

1. DONATIONS made to YOU from January 2004 to present.
2. YOUR funds, assets, and/or property obtained from January 2004 to present, including, but not limited to, banking or other records of such funds, assets, and/or property.
3. All ACCOUNTING systems, software, and methods YOU use to record DONATIONS made to YOU, and expenses paid by YOU from January 2004 to present.
4. YOUR use of funds obtained by DONATION from January 2004 to present.
5. The identities of PERSONS who perform, or have performed, ACCOUNTING services for YOU from January 2004 to present.

6. The banks, credit unions, or other financial institutions that hold or held any of YOUR funds, property, and/or assets from January 2004 to present.
7. YOUR sources of revenue from January 2004 to present.
8. Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment against YOU in this action, to indemnify YOU, or to reimburse YOU for payments made to satisfy the judgment and whether YOU have or intend to make such a claim.
9. Payments and/or transfers made by YOU to Guidepost Solutions, Rachel Denhollander, and/or any other consultant, victim-advocate, or PERSON who is engaged in public relations, crisis management, marketing, or rebranding.
10. Payments and/or transfers made by YOU to any ministry, church, charitable organization, or PERSON who is not employed or hired by YOU.
11. Payments and/or transfers made by YOU to any PERSON who alleges or alleged having experienced any form of abuse or harassment, including sexual and spiritual abuse or harassment, by Ravi Kumar Zacharias, or to any third party on behalf of any such PERSON.
12. Payments or transfers made by YOU to any law firm and/or attorney for

services RELATING TO sexual and spiritual misconduct allegations made against Ravi Kumar Zacharias.

13. Transfers of any of YOUR funds, property, or assets to any offshore bank account(s).

Dated: August 25, 2021

By: /s/ Michael L. McGlamry
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ATTACHMENT A

1. All DOCUMENTS used or REFERRED TO by YOU in preparation for YOUR deposition.